

- 8 -

REMARKS

Agents of Record

Further to a Customer Number Batch Update form dated and mailed April 7, 2004 which included a reference to the captioned application, the undersigned attorney confirms that the contact agent of record, Alfred Macchione, has relocated his practice to the firm of:

McCarthy Tétrault LLP
Customer Service #: 27155
Toronto Dominion Bank Tower
P.O. Box 48, Suite 4700
Toronto, Ontario
M5K 1E6 Canada

Applicant has consented to having contact agent retain responsibility as agent of record. Undersigned attorney advises that in total the following agents of record are also now associated with the same customer number and have the authority to also act on behalf of the Applicant for the above matter:

Alfred Macchione	Reg. No. 40,333
Robert Nakano	Reg. No. 46,498 (undersigned attorney)
Brian Gray	Reg. No. 30,017
Kenneth Bousfield	Reg. No. 40,460
Christopher Hunter	Reg. No. 52,528

Undersigned attorney also advises that the attorney reference number has been changed to:

Atty's Docket No.: 123081 339590 (T01215-0014-US1)

Applicant requests that the USPTO update its records for this application accordingly.

Application No. 09/558,589
Reply to Office Action of February 9, 2004

- 9 -

In the Claims

Claims 1 to 24 are pending in the application. Claims 1, 9, 10 and 15 are amended herein.

In the outstanding Office Action, Examiner rejected claims 1, 2, 7-19 and 21-24 under 35 U.S.C. 102(a) as being anticipated by U.S. Patent No. 5,684,797 to Aznar *et al.* ("Aznar"). Examiner further indicated that the claims as amended did not recite certain features relating to conversion and configuration steps found in the specification. Under 35 U.S.C. 103(a), Examiner further rejected claims 3-6 and 20 as being unpatentable over Aznar in view of U.S. Patent No. 5,959,972 to Hamami *et al.* ("Hamami"). The Examiner made the Office Action final.

Applicant traverses Examiner's rejection of Claims 1-24 as follows.

Applicant's invention relates to providing non-disruptive conversion and configuration of a connection for packets from a point-to-point connection to a point-to-multipoint connection in a communication device. Preferably, the conversion is performed within an input point and an output point in the device. In a further aspect of Applicant's invention, configuration of the point-to-multipoint connection is performed only after the initial point-to-point connection is provided. The configuration may be done at the noted input point of the device by attaching overhead information for the point-to-multipoint connection to packets received at the input point. See Figs. 1, 4, 5, 9 and 10 and the related description in the specification at page 10, line 20 to page 13, line 11 of Applicant's specification.

Application No. 09/558,589

Reply to Office Action of February 9, 2004

- 10 -

Meanwhile, Aznar only teaches a system for converting a point-to-point connection to a point-to-multipoint connection by modifying destination connection information. See the description of TP_vector 210 in Figs. 1 and 2 and the corresponding text at column 2, line 52 to column 3, line 20. In particular, therein the following passage highlights notable differing features of Aznar:

"The invention concerns the handling of the ATM unicast and multicast traffic and resides in transmit side of 110 of the adapter detailed in Fig. 2

... [T]he header of the received cell is read by a look-up function 206. The look-up function 206 is not part of the invention and can be implemented in several ways such as content addressable memory, pattern search tree or direct table. In a preferred embodiment of the invention, the look-up function 206 is implemented by a direct table. As a result of the look-up operation, a connection control information block 208 is generated, which contains an initial target port vector TP_vector 210, which in turn contains the identifiers of all target ports for the current ATM cell

...[T]he TP_vector 210 has a width related to the total number n of output ports attached to the adapter. In this preferred embodiment, a single bit i is associated to the port Pi and is set, i.e., changed to '1', if the port Pi belongs to the multicast tree." [underlining added]

Independent claims 1, 9 and 15 are amended to more clearly distinguish features of the invention from the Aznar and to more clearly identify conversion and configuration steps as found in Applicant's specification.

As amended and supported by the following argument, Applicant traverses rejection of claim 1 as follows. In claim 1, step (e) is amended to more clearly highlight that it is executed only after step (d) and to define that the overhead information is

McCarthy Tétrault LLP TDO-RED #8233894 v. 1

Application No. 09/558,589

Reply to Office Action of February 9, 2004

- 11 -

changed from the original point-to-point information. As such, Applicant submits that features introduced to step (e), more clearly distinguish it from Aznar. Aznar does not teach subsequently changing the original point-to-point information relating to the packet as provided in newly amended Claim 1. Further, in claim 1 steps relating to non-disruptive conversion steps mentioned in pages 11 and 12 of its specification are clearly mapped as more clearly separate, sequentially executed steps as steps (d) and (e).

In view of amendments and argument provided for claim 1, as claim 2 depends from claim 1, its rejection is also traversed.

Rejection of Claims 3-6 are traversed as follows. In view of amendments to Claim 1 and argument provided herein, Applicant submits that each of Claims 3-6 is patentable over Aznar in view of Hamami under U.S.C. 103(a). In particular, Hamami does not teach all aspects of amended claim 1. As noted by Examiner, Hamami is related to providing link redundancy for an ATM switch. Hamami does not teach systems relating to conversion of point-to-point connections to point-to-multipoint connections.

In view of amendments and argument provided for claim 1, as claims 7 and 8 ultimately depend from claim 1, their rejections are individually and collectively traversed.

As amended and supported by the following argument, Applicant traverses rejection of claim 9. In claim 9, step (c) is amended to more clearly highlight the fact that it is executed only after step (b). Further, Applicant submits that Aznar does not teach step (c), wherein packets received at a first point in the device are configured to connect with the second and third points using the multicast addressing scheme. In Aznar, any

McCarthy Tétrault LLP TDO-RED #8233894 v. 1

Application No. 09/558,589
Reply to Office Action of February 9, 2004

- 12 -

changes for a packet from a point-to-point regime to a point-to-multipoint regime are done at its TP_vector which is at an output point for its system.

As amended and supported by the following argument, Applicant traverses rejection of claim 10. In claim 10, step (f) is amended to more clearly highlight that it is executed only after step (e). As rejection of claim 9 is traversed, rejection of claim 10 is also traversed.

In view of amendments and argument provided for claim 9, as claims 11-14 ultimately depend from claim 9, their rejections are individually and collectively traversed.

As amended and supported by the following argument, Applicant traverses rejection of claim 15. In claim 15, step (d) is amended to more clearly highlight the fact that it is executed only after step (c). Applicant submits that Aznar does not teach step (d), wherein point-to-multipoint overhead is attached to packets received at an input point. In Aznar, any changes for a packet from a point-to-point regime to a point-to-multipoint regime are done at its TP_vector which is at an output point for its system.

In view of amendments and argument provided for claim 15, as claims 16-19 ultimately depend from claim 15, their rejections are individually and collectively traversed.

Rejection of Claim 20 is traversed as follows. In view of amendments to Claim 15 and argument provided herein, Applicant submits that Claim 20 is patentable over Aznar in view of Hamami under U.S.C. 103(a). In particular, Hamami does not teach all

Application No. 09/558,589
Reply to Office Action of February 9, 2004

- 13 -

aspects of amended claim 15. As noted by Examiner, Hamami is related to providing link redundancy for an ATM switch. Hamami does not teach systems relating to conversion of point-to-point connections to point-to-multipoint connections.

In view of amendments and argument provided for claim 15, as claims 21-24 ultimately depends from claim 15, their rejections are individually and collectively traversed.

Closing Comments

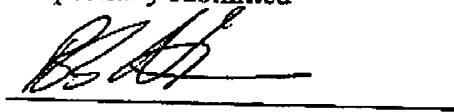
With the filing of the RCE herewith, Applicant notes that the "Final" status of the outstanding Office Action should be withdrawn.

In view of the present amendments, Applicant earnestly solicits that this application be permitted to proceed to allowance. The Examiner is invited to contact the undersigned by telephone to discuss this case further, if necessary.

June 9, 2004

Date

Respectfully submitted



Robert H. Nakano
(Registration No. 46,498)

McCarthy Tétrault LLP
Box 48, Suite 4700
66 Wellington Street West
Toronto Dominion Bank Tower
Toronto, Ontario MSK 1E6 Canada

Telephone: (416) 601-7852
Facsimile: (416) 858-0673

McCarthy Tétrault LLP T1DO-RED #8233894 v. 1